

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



**FILED**

03-11-08

04:59 PM

Order Instituting Investigation to Consider Policies to Achieve the Commission's Conservation Objectives for Class A Water Utilities.

Investigation 07-01-022  
(Filed January 11, 2007)

In the Matter of the Application of Golden State Water Company (U 133 E) for Authority to Implement Changes in Ratesetting Mechanisms and Reallocation of Rates.

Application 06-09-006  
(Filed September 6, 2006)

Application of California Water Service Company (U 60 W), a California Corporation, requesting an order from the California Public Utilities Commission Authorizing Applicant to Establish a Water Revenue Balancing Account, a Conservation Memorandum Account, and Implement Increasing Block Rates.

Application 06-10-026  
(Filed October 23, 2006)

Application of Park Water Company (U 314 W) for Authority to Implement a Water Revenue Adjustment Mechanism, Increasing Block Rate Design and a Conservation Memorandum Account.

Application 06-11-009  
(Filed November 20, 2006)

Application of Suburban Water Systems (U 339 W) for Authorization to Implement a Low Income Assistance Program, an Increasing Block Rate Design, and a Water Revenue Adjustment Mechanism.

Application 06-11-010  
(Filed November 22, 2006)

Application of San Jose Water Company (U 168 W) for an Order Approving its Proposal to Implement the Objectives of the Water Action Plan.

Application 07-03-019  
(Filed March 19, 2007)

**RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO MOTION  
OF CALIFORNIA WATER ASSOCIATION TO STRIKE PORTIONS  
OF THE REPLY BRIEF OF THE DIVISION OF RATEPAYER ADVOCATES**

NATALIE D. WALES  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Phone: (415) 355-5490  
Fax: (415) 703-2262  
ndw@cpuc.ca.gov

March 11, 2008

Attorney for  
DIVISION OF RATEPAYER ADVOCATES

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation to Consider Policies to Achieve the Commission's Conservation Objectives for Class A Water Utilities.	Investigation 07-01-022 (Filed January 11, 2007)
In the Matter of the Application of Golden State Water Company (U 133 E) for Authority to Implement Changes in Ratesetting Mechanisms and Reallocation of Rates.	Application 06-09-006 (Filed September 6, 2006)
Application of California Water Service Company (U 60 W), a California Corporation, requesting an order from the California Public Utilities Commission Authorizing Applicant to Establish a Water Revenue Balancing Account, a Conservation Memorandum Account, and Implement Increasing Block Rates.	Application 06-10-026 (Filed October 23, 2006)
Application of Park Water Company (U 314 W) for Authority to Implement a Water Revenue Adjustment Mechanism, Increasing Block Rate Design and a Conservation Memorandum Account.	Application 06-11-009 (Filed November 20, 2006)
Application of Suburban Water Systems (U 339 W) for Authorization to Implement a Low Income Assistance Program, an Increasing Block Rate Design, and a Water Revenue Adjustment Mechanism.	Application 06-11-010 (Filed November 22, 2006)
Application of San Jose Water Company (U 168 W) for an Order Approving its Proposal to Implement the Objectives of the Water Action Plan	Application 07-03-019 (Filed March 19, 2007)

**RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO MOTION  
OF CALIFORNIA WATER ASSOCIATION TO STRIKE PORTIONS  
OF THE REPLY BRIEF OF THE DIVISION OF RATEPAYER ADVOCATES**

**I. INTRODUCTION**

Pursuant to Rule 11.1(e) of the Commission's Rules of Practice and Procedure ("Rules"), the Division of Ratepayer Advocates ("DRA") submits this Response to the Motion of California Water Association to Strike Portions of the Reply Brief of the Division of Ratepayer Advocates ("Motion" or "Motion to Strike"). The Motion to Strike was filed on February 25, 2008; this Response is therefore timely filed.<sup>1</sup>

---

<sup>1</sup> Rule 11.1(e) allows responses to motions within 15 days of the date the motion was served.

In its Motion, California Water Association (“CWA”) requests that the Commission strike certain text of DRA’s Reply Brief, as well as Attachment B to that Reply Brief. CWA alleges that, in briefing the issue of whether a water company with certain decoupling mechanisms and conservation rates should also receive a downward adjustment to its return on equity (“ROE”), DRA has introduced material that is not based on the record, lacks relevance, and/or has not been properly sponsored by a witness and subject to cross-examination.<sup>2</sup> The Commission should reject CWA’s arguments because they are meritless.

## **II. BACKGROUND**

In Phase 1B of this proceeding, parties submitted two rounds of testimony on the issue of the appropriate ROE impact, if any, of certain decoupling mechanisms (Water Revenue Adjustment Mechanisms and Modified Cost Balancing Accounts, or “WRAM/MCBA mechanisms”) proposed in conjunction with certain conservation rate designs.<sup>3</sup> Evidentiary hearings were held on November 15-27, 2007. Parties filed Opening Briefs on January 16, 2008 and Reply Briefs on February 6, 2008.

On February 25, 2008, CWA submitted a Motion to strike the following language in DRA’s Reply Brief:<sup>4</sup>

Moreover, the Commission also should recognize that other factors – such as recent interest rate cuts by the Federal Reserve – have already made investments in water utility stocks more attractive than they were at the time testimony was filed this fall, even without the additional diminution of risk associated with the WRAM/MCBAs. For example, the return on 30-year Treasury bonds was 4.88% as of the week ending October 12, 2007;<sup>5</sup> it has dropped 53 basis points, to

---

<sup>2</sup> Motion at 3.

<sup>3</sup> The Administrative Law Judge (“ALJ”) in this proceeding issued a ruling on May 29, 2007 with ten questions relating to whether there should be an ROE adjustment (“5/29/07 Ruling”). Based on the settlements on conservation rates and decoupling mechanisms submitted in Phase 1 of this proceeding, this ROE issue is relevant to California Water Service Company (“CWS”), Golden State Water Company (“GSWC”), and Park Water Company (“Park”). See DRA Opening Brief at 1-2. The Commission adopted the conservation rate design settlements of CWS and Park in Phase 1A (D.08-02-036 at Ordering Paragraph 1), and is considering GSWC’s settlement in Phase 1B.

<sup>4</sup> Motion at 3.

<sup>5</sup> Exhibit 39 (Murray Direct, 10/19/07) at 9.

4.35%, as of the week ending February 1, 2008.<sup>6</sup> *This decrease in long-term “risk-free” interest rates would be sufficient, in and of itself, to finance the entire low-end of DRA’s proposed range of ROE reductions.*<sup>7</sup> Unlike the speculative increases in other risks that the utilities have invoked as reasons for *not* reducing their ROEs at this time, this decrease in interest rates is specific, publicly verifiable and quantifiable.<sup>8</sup>

CWA also seeks to strike Attachment B to DRA’s Reply Brief, a two-page document issued by the United States Federal Reserve (“the Fed”) which is a “statistical release” of “H.15 (519) Selected Interest Rates” dated February 4, 2008 (“Statistical Release”).

### III. DISCUSSION

While CWA makes several tenuous allegations in challenging a section of DRA’s Reply Brief and an attachment, the heart of CWA’s Motion appears to be that (a) the text identified by CWA lacks an evidentiary basis and is otherwise not self-evident, and (b) the Fed’s Statistical Release, which has not been made part of the official record, should have been sponsored by a witness so that issues such as the meaning, relevance, and purpose of the document could have been challenged through cross-examination.<sup>2</sup> DRA explains below how the language challenged by CWA is clearly based on the record, that the Commission should take official notice of the Fed’s Statistical Release, and that the meaning, relevance, and purpose of the Statistical Release are in fact self-evident within the context of Phase 1B.

---

<sup>6</sup> Federal Reserve Statistical Release H.15, release date February 4, 2008, available online at <http://www.federalreserve.gov/releases/h15>. DRA requests that the Commission take official notice of this government publication. For the Commission’s convenience, a copy of this Federal Reserve release is included as Attachment B to this Reply Brief.

<sup>7</sup> Without itself endorsing the Capital Asset Pricing Methodology (“CAPM”) as a method for determining the cost of equity, DRA notes that under that methodology (which has frequently been endorsed by utility witnesses), decreases to the risk-free government bond rate are passed through one-for-one as decreases to the investor-required ROE.

<sup>8</sup> DRA Reply Brief at 17-18.

<sup>2</sup> Motion at 3.

**A. The Commission Should Take Official Notice Of Federal Reserve Statistical Release H.15**

CWA alleges that Attachment B to DRA's Reply Brief should be stricken because the "Federal Reserve Statistical Release was not presented by DRA during the evidentiary hearings in this case and is not part of the record."<sup>10</sup> In footnote 59 of DRA's Reply Brief, DRA requested that the Commission take official notice of the Fed's H.15 Statistical Release. Commission Rule 13.9 specifies that "[o]fficial notice may be taken of such matters as may be judicially noticed by the courts of the State of California." Several provisions of the California Evidence Code address the matters of which judicial notice may be taken. In particular, Evidence Code § 452 states that official notice can be taken of the following:

(c) Official acts of the legislative, executive, and judicial departments of the United States....

...

(g) Facts and propositions that are of such common knowledge within the territorial jurisdiction of the court that they cannot reasonably be the subject of dispute.

(h) Facts and propositions that are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy.<sup>11</sup>

With regard to § 452(c), the actions of the Federal Reserve that implement monetary policy in the United States by causing changes in interest rates should be considered "official acts" within the meaning of § 452.<sup>12</sup> Widely known and relied upon by financial and economic analysts, the H.15 Statistical Release reflects the impact of the Fed's actions, and identifies the interest rates of various government securities as well as

---

<sup>10</sup> CWA Motion at 3.

<sup>11</sup> Evidence Code § 452(c).

<sup>12</sup> The Fed is an entity "independent within the government," and could technically be considered outside of the "legislative, executive, and judicial departments of the United States" specified by Evidence Code § 452(c). *See* FAQs about the Federal Reserve System, under "Who Owns the Federal Reserve?" <http://www.federalreserve.gov/generalinfo/faq/faqfrs.htm> (last updated March 7, 2007). Nevertheless, the Fed was created by legislation to serve as the nation's central bank, and its acts are considered those of the United States government. Thus, "official acts" of the Fed should be considered as meeting the requirements of § 452(c).

commercial paper, corporate bonds, and other summary data. Because the Fed's H.15 Statistical Release is a reflection of the Fed's "official acts" and is issued by the Fed itself, the Commission should take official notice of the document consistent with Evidence Code § 452(c).

Furthermore, Evidence Code § 452(g) and (h), which specify that official notice can be taken of certain "facts and propositions" that are "common knowledge" or "capable of immediate and accurate determination," respectively, require an analysis of "reasonableness" when exercising the discretion to take official notice. As a foundational matter (discussed in greater detail in Section III.B, below), the relevance of changes in interest rates to investor concerns, and to cost of capital determinations, has been widely discussed in Phase 1B. Furthermore, in light of the extensive economic and financial theory espoused throughout Phase 1B, it should be considered a matter of common knowledge that actions by the Federal Reserve influence interest rates,<sup>13</sup> and that such influence can be reflected in specific interest rates like those provided in the Fed's H.15 Statistical Release. In fact, DRA Witness Terry Murray specifically referenced the return on long-term Treasury bonds in written testimony,<sup>14</sup> citing the October 15, 2007 version of the H.15 Statistical Release as the source of that information,<sup>15</sup> and discussed the interest rates of Treasury bonds in exactly the same context as discussed in the DRA's Reply Brief language that CWA challenges in its Motion.<sup>16</sup> DRA's request would simply augment the record with more recent economic data from the exact same source as Ms. Murray cited in her Direct Testimony, something the Commission should welcome, not agree to strike.

---

<sup>13</sup> More accurately, the Fed takes actions that influence the federal funds rate, and the resulting market reaction causes changes in other interest rates. This level of detail, however, is not necessary for either an understanding of the arguments that DRA and other parties have made relating to interest rates, as discussed in Section III.B, *infra*, or an understanding of any material issues in this case.

<sup>14</sup> Exhibit 39 (Murray Direct, 10/19/07) at 9.

<sup>15</sup> *Id.* at note 6.

<sup>16</sup> *Id.* at 9, 15-16.

Finally, the information contained in the document at issue, the Fed's H.15 Statistical Release, is "capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy" as specified in Evidence Code § 452(h). To wit, the specific information is readily available on the Fed's website, a source that must be considered "of reasonably indisputable accuracy."<sup>17</sup>

Since Federal Reserve decisions have substantial effects on the nation's economy, taking official notice of its publications is entirely appropriate in a decision that will evaluate whether existing ROE returns for Commission-regulated water utilities are overly generous in an era of low interest rates. The Commission should therefore reject CWA's request to strike the Fed's H.15 Statistical Release, and should take official notice of the document as requested by DRA.

**B. DRA's Assertions Are Relevant And Based On The Record**

**1. The Relevance Of Interest Rates To Investors And To The Desirability Of Stocks Is Implicit In Phase 1B**

CWA argues that "the relevance to equity investors, if any, of periodic adjustments (up or down) to different types of interest rates [was not] explored in any depth or specificity in this proceeding."<sup>18</sup> CWA's assertion is beyond disingenuousness. References to the impact of interest rates on the interests of investors abound in the record for Phase 1B. For example, CWA's own witness, Ms. Susan D. Abbott, testified on the stand that, in considering whether a decoupling mechanism merits an ROE adjustment, Ms. Abbott "thought through what risks investors look at and what it is that concerns them when they are choosing what kinds of companies to invest in."<sup>19</sup> Ms. Abbott concluded that "interest rates," among other things, are "the kinds of risks that

---

<sup>17</sup> <http://www.federalreserve.gov/releases/h15>.

<sup>18</sup> Motion at 3-4.

<sup>19</sup> Abbott/CWA, 10 Tr. 1035:28 – 1036:3.

investors are interested in.”<sup>20</sup> In addition, CWA’s own Opening Brief repeatedly refers to the Commission’s own consideration of interest rates in determining a utility’s return on equity.<sup>21</sup>

CWA also alleges that “DRA’s assertion that recent interest rate cuts by the Federal Reserve ‘have already made investments in water utility stocks more attractive than they were at the time testimony was filed’ is not a fact to which any witness in this proceeding has testified, and is certainly not self-evident...”<sup>22</sup> As described above, CWA Witness Abbott established that interest rates are one of the issues that investors consider,<sup>23</sup> the logical inference being that there can be a relationship between interest rates and whether a stock is “attractive” to investors. Furthermore, in cross-examining GSWC Witness Michael George during evidentiary hearings, counsel for the Consumer Federation of California (“CFC”) explicitly asked whether investors view utility stocks more favorably when interest rates are lower:

Q: Would you agree that, in a recession, utility stocks are an attractive buy because investors prefer stocks of companies with reliable earnings in a low economy; and when interest rates fall, utility stocks look like a better investment than CDs and bonds?

A: Boy, there’s a lot of generalization there. And –

---

<sup>20</sup> Abbott/CWA, 10 Tr. 1038:7-13. DRA Witness Murray also referenced the connection between interest rates and cost of capital in written testimony. In discussing the appropriate timing to evaluate a water utility’s cost of capital, Ms. Murray stated that “[t]he Commission cannot reconsider the cost of capital every time interest rates go up and down – a that happens on a daily basis, and most such fluctuations are relatively small and fall within a range of outcomes that was anticipated when the Commission last set the authorized rate of return.” Exhibit 40 (Murray Reply, 11/13/07) at 14.

<sup>21</sup> In determining the return on equity for Pacific Gas and Electric, the Commission stated that relevant factors “must be viewed in the context of recent increases in inflation and upward trends in interest rates.” CWA Opening Brief at 37 (citing D.89316, 1978 Cal. PUC Lexis 973, \*27-28). CWA also cites to a decision in which the Commission took “cognizance of the decline in interest rates that has occurred since the submission of [the] proceeding” in determining the return on equity for Southern California Edison. CWA Opening Brief at 41 (citing D.82-12-055, 1982 Cal. PUC LEXIS 1209, \*233-234).

<sup>22</sup> Motion at 3.

<sup>23</sup> Abbott/CWA, 10 Tr. 1038:7-13.



Q: Not unlike some of the testimony in this case.

A: I think as a general proposition that what the quoted language suggests is consistent with my experience. That in period of volatility when there is a flight to quality, utility equities tend to be viewed as less volatile and therefore tend to benefit from a flight to quality.<sup>24</sup>

Accordingly, DRA's statements in its Reply Brief that there has been a fall in interest rates between the time ROE testimony was filed and the filing of the Reply Brief (which is a factual statement, as discussed in Section III.B.2, below), and that the interest rate decrease is a factor that makes water utility stocks more attractive,<sup>25</sup> are directly reflective of issues that are already in the record in Phase 1B.

## **2. CWA's Discussion Of Interest Rates And The Federal Reserve Itself Is Misguided**

CWA's discussion of interest rate adjustments in its Motion to Strike is puzzling. CWA argues:

There may be many different factors on which the Federal Reserve bases its decisions with respect to interest rate adjustments. There are also different types of interest rates that are subject to adjustment. To the best of CWA's knowledge, the recent Federal Reserve adjustments in interest rates did not address the return on 30-year Treasury bonds.<sup>26</sup>

DRA addresses each of these statements in turn. First, the "factors on which the Federal Reserve bases its decisions with respect to interest rate adjustments" are irrelevant.<sup>27</sup> In its Reply Brief, DRA makes no assertion regarding why the Fed has adjusted interest rates, or the type of interest rates that have been adjusted, and the motivations of the Fed have no bearing on the DRA language challenged by CWA. Second, as discussed above, there have been numerous references to interest rates generally in written testimony, live testimony, and CWA's own Opening Brief.<sup>28</sup> Thus,

---

<sup>24</sup> Wodtke/CFC and George/ GSWC, 8 Tr. 842:16 – 843:1.

<sup>25</sup> Implicit in this statement is that all else is held equal (*i.e.*, all things being equal, a decrease in interest rates makes water utility stocks more attractive).

<sup>26</sup> Motion at 3-4.

<sup>27</sup> *Id.* at 3.

<sup>28</sup> Section III.B.1, *supra*.

CWA's caviling that there are "different types of interest rates that are subject to adjustment" is a distinction without a difference.<sup>29</sup>

Third, in the section of DRA's Reply Brief that CWA seeks to strike, DRA discusses how the return on 30-year Treasury bonds, which was 4.88% when direct testimony was filed,<sup>30</sup> has since dropped to 4.35%.<sup>31</sup> This is a statement of fact. CWA, however, argues that "the recent Federal Reserve adjustments in interest rates did not address the return on 30-year Treasury bonds."<sup>32</sup> As an initial matter, DRA notes that CWA's reference to "the recent" Federal Reserve adjustments in interest rates is unclear. More importantly, however, DRA's Reply Brief does not argue that the Federal Reserve itself changed the return on 30-year Treasury bonds; the Reply Brief merely cites the H.15 Statistical Release as an authoritative source (already referenced in Ms. Murray's Direct Testimony) regarding the level of that return at a given point in time.

### **3. The Fed's Statistical Release Does Not Require A Sponsoring Witness**

CWA argues that the Fed's H.15 Statistical Release "has not been sponsored by a sworn witness as to its meaning," and that there has been no opportunity to "cross examine a sponsoring witness with respect to its meaning or relevance or purpose for which it might have been offered."<sup>33</sup> CWA is simply wrong. As noted above, Ms. Murray sponsored sworn testimony regarding the Fed's H.15 Statistical Release as a source of data on long-term Treasury bond rates and used that information to make a calculation regarding the implied risk premium in the Commission's authorized return for California Water Service.<sup>34</sup> CWA and all other parties had the opportunity to cross-examine Ms. Murray about her use of the Fed's H.15 Statistical Release for this purpose, and indeed, opposing experts had the opportunity to file rebuttal testimony if they felt

---

<sup>29</sup> Motion at 3.

<sup>30</sup> See DRA Reply Brief at 18 and Exhibit 39 (Murray Direct, 10/19/07) at 9, referencing the return as of the week ending October 12, 2007.

<sup>31</sup> DRA Reply Brief at 18, referencing the return as of the week ending February 1, 2008.

<sup>32</sup> Motion at 3.

<sup>33</sup> *Id.* at 3.

<sup>34</sup> Section III.A, *supra*; Exhibit 39 (Murray Direct, 10/19/07) at 9 (note 6), 15-16.

that Ms. Murray's Direct Testimony had misrepresented the data in the H.15 Statistical Release or had used those data inappropriately. Thus, the issue here is merely whether the Commission can rely on a more recent version of the H.15 Statistical Release to obtain a more recent figure for the return on 30-year Treasury bonds. As DRA has recommended above, the Commission can and should take official notice of the Fed's H.15 Statistical Release, thus obviating the need for a sponsoring witness.

In addition, it would be disingenuous for any witnesses testifying on the ROE issue in Phase 1B to claim ignorance of the meaning and relevance of the document in the context of analyzing how interest rates can impact investor decisions. Finally, the purpose for which DRA has offered the document is apparent from the statements in DRA's Reply Brief and from the record that has been developed in Phase 1B.

### **C. CWA's Allegations Questioning DRA's "Tactics" Should Be Rejected**

In its Motion, CWA alleges that DRA engaged in "an intentional, and questionable, tactic of waiting until its reply brief to assert its principal arguments, rather than asserting these arguments in its opening brief."<sup>35</sup> CWA argues that, "[b]y presenting a much more detailed reply brief in comparison to its opening brief, DRA has limited other parties' ability to reply to its principal arguments in this case."<sup>36</sup> CWA asserts these generalities without substantiation.

For example, CWA fails to identify the alleged "principal arguments" in DRA's Reply Brief that are not contained within DRA's Opening Brief. On the contrary, DRA's Opening Brief discusses DRA's recommendations as initially laid out in Ms. Murray's Direct Testimony,<sup>37</sup> which in turn responded directly to the questions regarding ROE raised in the 5/29/07 Ruling.<sup>38</sup> While further refined through Ms. Murray's Reply Testimony and evidentiary hearings, DRA's "principal arguments" have been consistent throughout Phase 1B. Similarly, CWA does not identify any substantive arguments in

---

<sup>35</sup> Motion at 2.

<sup>36</sup> *Id.* at 2.

<sup>37</sup> See Exhibit 39 (Murray Direct, 10/19/07) at 3-5.

<sup>38</sup> 5/29/07 Ruling at 4-5.

DRA's Reply Brief that CWA would otherwise have responded to, if given the opportunity.

In fact, CWA's sole offer of proof that DRA has "intentionally" engaged in "questionable" tactics – an allegation that should not be made lightly – appears to be that DRA's Reply Brief (39 pages) is longer than DRA's Opening Brief (19 pages).<sup>39</sup> This is no great surprise given that DRA was responding to more than one Opening Brief. The Commission should reject CWA's specious accusations as without merit.

#### **IV. CONCLUSION**

For the reasons set forth above, the Commission should deny CWA's Motion to Strike in its entirety.

Respectfully submitted,

/s/ NATALIE D. WALES

---

NATALIE D. WALES  
Staff Counsel

California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Phone: (415) 355-5490  
Fax: (415) 703-2262  
ndw@cpuc.ca.gov

March 11, 2008

Attorney for  
DIVISION OF RATEPAYER ADVOCATES

---

<sup>39</sup> Motion at 2.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of “**RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO MOTION OF CALIFORNIA WATER ASSOCIATION TO STRIKE PORTIONS OF THE REPLY BRIEF OF THE DIVISION OF RATEPAYER ADVOCATES**” in **I.07-01-022, et al.** by using the following service:

[ X ] **E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

[ X ] **U.S. Mail Service:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses, if any.

Executed on **March 11, 2008** at San Francisco, California.

/s/ JANET V. ALVIAR
Janet V. Alviar

**N O T I C E**

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

\*\*\*\*\*

**Service List**  
**I.07-01-022 et al.**

tsmegal@calwater.com;  
bdp@cpuc.ca.gov;  
bill@jbsenergy.com;  
bloehr@greatoakswater.com;  
bobbkelly@bobbkelly.com;  
broeder@greatoakswater.com;  
charak@nclc.org;  
charles.forst@360.net;  
chris@cuwcc.org;  
cmailoux@turn.org;  
dadelloso@sgvwater.com;  
danielle.burt@bingham.com;  
darlene.clark@amwater.com;  
debbie@ejcw.org;  
debershoff@fulbright.com;  
demorse@omsoft.com;  
dietrichlaw2@earthlink.net;  
doug@parkwater.com;  
dsb@cpuc.ca.gov;  
dstephens@amwater.com;  
ed@parkwater.com;  
enriqueg@lif.org;  
flc@cpuc.ca.gov;  
fyanney@fulbright.com;  
jcp@cpuc.ca.gov;  
jeff@jbsenergy.com;  
jguzman@nossaman.com;  
jhawks\_cwa@comcast.net;  
jlg@cpuc.ca.gov;  
jlkiddoo@swidlaw.com;  
john.greive@lightyear.net;  
jws@cpuc.ca.gov;  
katie@cuwcc.org;  
kendall.macVey@bbklaw.com;

kswitzer@gswater.com;  
ldolqueist@manatt.com;  
leigh@parkwater.com;  
lex@consumercal.org;  
llk@cpuc.ca.gov;  
lmcghee@calwater.com;  
luhintz2@verizon.net;  
lwa@cpuc.ca.gov;  
lweiss@manatt.com;  
marcel@turn.org;  
mcegelski@firstcomm.com;  
mlm@cpuc.ca.gov;  
mmattes@nossaman.com;  
mpo@cpuc.ca.gov;  
mvander@pcl.org;  
nancitran@gswater.com;  
ndw@cpuc.ca.gov;  
nsuetake@turn.org;  
owein@nclcdc.org;  
palle\_jensen@sjwater.com;  
phh@cpuc.ca.gov;  
pschmiede@schmiedelaw.com;  
pucservice@dralegal.org;  
rdiprimio@valencia.com;  
rkmoore@gswater.com;  
sferraro@calwater.com;  
sleeper@manatt.com;  
smw@cpuc.ca.gov;  
tfo@cpuc.ca.gov;  
tguster@greatoakswater.com;  
tjryan@sgvwater.com;  
tkim@rwglaw.com;  
trh@cpuc.ca.gov;